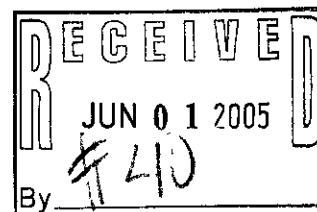


LOGAN COUNTY BANK

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May 20, 2005



Robert E. Feldman, Executive Secretary
Attention: Comments, Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Change in Classification of Loans:

Dear Mr. Feldman:

We are in opposition of changing in commercial loan classifications. The Borrower rating and Facility ratings would be more complex and more burdensome on our small institution. Our regulators and bankers have developed a common vocabulary and understanding of terminology. We see no need to change our vocabulary and confuse everyone involved. We question whether there is a big enough problem with the rating disparities to require a new rating system. Why should this proposal apply to all banks? Why not propose a threshold for larger banks.

Please take this into consideration before making any changes in the current system.

Sincerely,

Joe Fritsche, President